

1 ADAM L. BRAVERMAN
United States Attorney
2 EMILY W. ALLEN (SBN 234961)
Emily.Allen@usdoj.gov
3 W. MARK CONOVER (SBN 236090)
Mark.Conover@usdoj.gov
4 PHILLIP L.B. HALPERN (SBN 133370)
Phillip.Halpern@usdoj.gov
5 BRADLEY G. SILVERMAN (DC Bar No. 1532664)
Bradley.Silverman@usdoj.gov
6 Assistant United States Attorneys
U.S. Attorney's Office
7 880 Front Street, Room 6293
San Diego, CA 92101
8 Telephone: (619) 546-6864
Attorneys for Plaintiff
9 *United States of America*

10 THOMAS W. MCNAMARA (SBN 127280)
tmcnamara@mcnamarallp.com
11 LOGAN D. SMITH (SBN 212041)
lsmith@mcnamarallp.com
12 McNamara Smith LLP
655 West Broadway, Suite 1600
13 San Diego, California 92101
Telephone: (619) 269-0400
14 Facsimile: (619) 269-0401

15 *Attorneys for Defendant Margaret E. Hunter*

16 UNITED STATES DISTRICT COURT
17 SOUTHERN DISTRICT OF CALIFORNIA

18 UNITED STATES OF AMERICA,

19 Plaintiff,

20 v.

21 DUNCAN D. HUNTER (1)
MARGARET E. HUNTER (2)

22 Defendants.
23

Case No. 3:18-cr-03677-W

**JOINT MOTION TO CONTINUE
SENTENCING HEARING OF
DEFENDANT MARGARET E.
HUNTER**

Judge: Hon. Thomas J. Whelan
Ctm: 3C
Current Hearing Date: Sept. 16, 2019
Current Hearing Time: 9:00 a.m.

1 The United States of America, by and through its attorneys of record, Emily
2 Allen, Philip L.B. Halpern, and W. Mark Conover, and Defendant Margaret E.
3 Hunter, by and through her attorneys of record, Thomas W. McNamara and Logan
4 D. Smith, respectfully move on a joint basis to request a continuance of Ms.
5 Hunter's sentencing hearing, which is currently set for September 16, 2019. The
6 parties jointly request that the Court schedule the sentencing hearing for December
7 2, 2019 at 9:00 a.m.

8 In support of this joint motion, the parties provide the following grounds:

- 9 1. On June 13, 2019, during Ms. Hunter's change of plea hearing, the
10 Court set Ms. Hunter's sentencing hearing for September 16, 2019 at
11 9:00 a.m. (ECF No. 33);
- 12 2. Currently, the trial of Co-Defendant Duncan Hunter is scheduled to
13 begin on September 10, 2019 at 9:00 a.m.;
- 14 3. Counsel for the United States of America and Defendant Duncan
15 Hunter have informed the Court that they anticipate that Mr. Hunter's
16 trial will last several weeks; and
- 17 4. The parties respectfully request that Ms. Hunter's sentencing hearing
18 be scheduled for December 2, 2019 (or any other convenient date for
19 the Court), so that the trial of Co-Defendant Duncan Hunter is able to
20 be completed prior to Ms. Hunter's sentencing hearing in light of her
21 ongoing cooperation obligations.

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1 For the foregoing reasons, the parties respectfully request to continue the
2 date of Ms. Hunter's sentencing hearing to December 2, 2019 at 9:00 a.m.

3 Respectfully submitted,

4 Dated: August 6, 2019

DAVID D. LESHNER
Attorney for the United States
Acting under Title 28, U.S.C. Section 515

6
7 By: /s/ Emily W. Allen
EMILY W. ALLEN
Emily.Allen@usdoj.gov
8 W. MARK CONOVER
Mark.Conover@usdoj.gov
9 PHILLIP L. HALPERN
Phillip.Halpern@usdoj.gov
10 BRADLEY G. SILVERMAN
Bradley.Silverman@usdoj.gov
11 Assistant United States Attorneys

12 Dated: August 6, 2019

MCNAMARA SMITH LLP

13
14 By: /s/ Logan D. Smith
LOGAN D. SMITH
lsmith@mcnamarallp.com
15 THOMAS W. MCNAMARA
tmcnamara@mcnamarallp.com
16 *Attorneys for Defendant Margaret E.*
17 *Hunter*
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CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of August, 2019, the foregoing document was electronically transmitted to the Clerk's Office using the CM/ECF System for filing, and for transmittal of a Notice of Electronic Filing to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system per Civil Local Rule 5.4.

VIA CM/ECF

Emily W. Allen
W. Mark Conover
Phillip L.B. Halpern
Bradley G. Silverman
Assistant U.S. Attorneys
U.S. Attorney's Office
Southern District of California
880 Front Street, Room 6293
San Diego, CA 92101
Tel.: (619) 546-9738
Emily.Allen@usdoj.gov;
Mark.Conover@usdoj.gov;
Phillip.Halpern@usdoj.gov;
Bradley.Silverman@usdoj.gov
Attorneys for United States of America

VIA CM/ECF

Gregory A. Vega
Ricardo Arias
Philip B. Adams
Seltzer Caplan McMahon Vitek
750 B Street, Suite 2100
San Diego, California 92101-8177
Tel.: 619-685-3003
Fax: 619-685-3100
vega@scmv.com; arias@scmv.com;
padams@scmv.com
*Attorneys for Defendant Duncan D.
Hunter*

VIA CM/ECF

Devin J. Burstein
Warren & Burstein
501 West Broadway, Suite 240
San Diego, Ca., 92101
Tel.: 619-234-4433
db@wabulaw.com
*Attorneys for Defendant Duncan D.
Hunter*

/s/ Logan D. Smith
Logan D. Smith
Attorneys for Defendant Margaret E. Hunter